	DOC	MU	ENT	CONT	ROL SYSTEM - COP	RF	SP	ONDE	NCE	EVID			
WELDON SPRIN	G B	IT	E RE	MEDT	AT. ACTION PROFES	_							
MK-FERGUSON 7295 Highway 94	UU.		INC.	WO :	3589 (314) 441-8	T 808	6	Doc	ument	Number:			
St. Charles, MC	6	330	3					Doc	ument	Type: LR-NI	<u> </u>	m)	DUR
SUBJECT TINI	47	,	T_{i}	Sta	te Argulate			Orio	inato	ors DCN: _			
1 DOT 1	11	!		n to	La superior de la constante de	En.		10	$\frac{CSR}{R}$	25.5.2621	2)	(2)
AUTHOR Trun	G,	سب الانت	10.Jh	1	Living Str		Q)	بح	A B	azardous (1)	ac	Ic	
					R _05/30	p ^) (<u> </u>	DATE 8/13	9.	3	
REFERENCED DOCUM	ŒNT	(S	2	006	5								
THIS IS A RESPON	ISE	TO	СОИМ	UNICA	TION. MINNES								
INITIATE ACTION					ACTION ITEM TR	ACK	TN	<u> </u>		DATED			
. B													- 1
ACTION PROUIDED	GNE	O T	O YC	LION -					_ D	EPARTMENT			
14		_											
IF ADDITIONAL A	~~~				TION ITEM LOG NUMB	ER .							
CLOSE ACTION IT	-11)N .	TEMS	ARE	ATTACHED, HOW MANY	' _							
		₩.											
ACTION ITEM LOG	NUM	RES	, ,	CTION	ITEM? NO _/_	3	ES		-				
COMPLETION DATE			`		CLOSING DOCUME	TNI	DI	м					
					APPROVAL	_							
COMMENTS													
				<u>-</u>									
		=											4
DISTRIBUTION	AT V	TACH W/O	APPRV	L.ROUTE	DISTRIBUTION	AT	TAC	APPR	/L.ROUT	-)	Ŧ		7
J.R. Pouers	T	T			H.R. Lewis	+	T	ORDER	INITIA	DISTRIBUTION	U	W/0	
A.A. Tucker		T			J.E. Williams	┿	╀	-	-	DOE	\bot	$oxed{oxed}$	
D.E. Steffen	T					╁	├		 	8.H. McCrecken	\perp	$oxed{oxed}$	
H.R. Arkrem	T					+	├-			J.S. Vanfossen	丄	\square	ı
C.R. Bowers						+	-			G.A. Hewtown	$oldsymbol{\perp}$		
J.A. Cooney						╁				V.K. Leve	丄	Ц	
A.D. forguson										J.E. Enright	$oldsymbol{oldsymbol{\perp}}$	Ц	
S.V. Green						\vdash				K.D. Lawer			
K.H. Greenwell					Reading File	Н	-			A. Elbeen	$oxed{oxed}$		
.b. Coto					Admin. Record/ENV COM	\vdash	-			E.R. Valdez			
i.d. Jonkins					Tech Editor	\vdash	+			J.M. Alchmond	Ц		
.i. NeKee						\vdash	+			M.B. Bollow			
.f. Belsen							+			8. Richardson			
.I. Marten		7			ORISINATOR:	-	+	-					
							1			DOCLMENT BONTROL	4	7	

AUG 1 3 1982

Dr. David E. Bedan Division of Environmental Quality Missouri Department of Natural Resources P.O. Box 176 Jefferson City, Missouri 65102

CONCURRENCES

ATG SYMBOL

INITIALS/SIG.

DATE

STG SYMBOL

INITIALS:SIG.

DATE

ATO SYMBOL

MITIALS/SIG.

BIAG

DATE

NITIALEIBIG.

ATG SYMBOL

INITIAL SIEIG.

DATE

ATO SYMBOL

MTALBON

DATE

ATG SYMBOL

MITALESIS.

MATE

ATE STUBBL

1017M364

...........

Dear Mr. Bedan:

WAIVER TO STATE REGULATION 10 CSR 25.5.262 (2)(C)1 DOT REQUIREMENTS DURING STORAGE OF HARARDOUS WASTE

One of the issues discussed during the coordination meeting among DOE, EPA, and MDNR representatives held on June 10, 1992, at Weldon Spring site was compliance with the State regulation 10 CSR 25.5.262 (2)(c)1, which requires that hazardous waste stored prior to off-site shipment be in compliance with the packaging, marking, and labelling requirements of the DOT during the entire on-site storage period. As stated in the discussion, our basis for the waiver request is that the site inventory of hazardous waste is not scheduled for off-site shipment and is expected to remain in storage for several years due to the lack of mixed are symbol waste TSD facilities. To meet the requirement would not only be costly, but moreover, the requirement to repackage the waste creates a situation that could result in personnel exposure to hazardous materials.

Enclosed per your request we have compiled a cost estimate and schedule for the activities required to achieve compliance with the requirement. Please note that our original estimate of 400 containers has been revised and the current estimate is 500 containers.

> "ORIGINAL SIGNED BY JERRY VAN FOSSEN"

> > Jerry S. Van Fossen Deputy Project Manager Weldon Spring Site Remedial Action Project

Inclosure: As stated

COST ESTIMATE FOR HAZARDOUS MATERIAL CONTAINER TRANSFER

The following is a cost estimate and schedule for compliance with 49 CFR 171.14. Part one represents the total task estimate and part two represents estimated cost compliance per deadline.

PART ONE		
Pat (maked must be a		CONCURRENCIS
Estimated number of containers	500	ATG SYMBOL
New Container Cost		
- 5 gal	A	INITIALS, SIG.
-10 gal	\$ 170	DATE
-15 gal	\$ 172	DATE
-30 gal	\$ 581	#10 #NUMB
-55 gal open top	\$ 160	ATG SYMBOL
-55 gal bung top	\$ 16,640	INITIALS.SIG.
-85 gal poly overpack	\$ 14,210	MINCHAU.
-B-12 box	\$ 1,488	
-B-25 box	\$ 4,200	DATE
TOTAL	<u>\$ 5,400</u>	
	\$ 43,021	ATG SYMBOL
New Label Cost		
-Hazardous Waste labels	A	INITIALS/SIG.
-Hazard Class labels	\$ 250	
-Radioactive labels	\$ 200 \$ 175 \$ 75 \$ 70 \$ 100	DATE
-Arrow up labels	\$ 175	
-Paint	\$ 75	ATO SYMBOL
-Extras	\$ 70	
-First time relabel of 100 containers	\$ 100	INITIAL BRID,
TOTAL	\$ 174	
	\$ 1,044	DATE
Material Transfer		
-Transfer tools est.		ATG SYMBOL
-Labor (4p X 1250hr Y \$20hr)	\$ 2,000	
TOTAL (49 A 1250HF X \$20HF)	\$100,000	
	\$102,000	MITIAL SIG.
Personal Protective Equipment	•	DATE
-4yvex (1248 baire o elea)		
-Boot covers (1248 pairs X \$2ea)	\$ 3,744	ATO SYMBOL
PAULAAN UICUNE 11748 maina u a	\$ 2,496	THE STREET
-Nitrile gloves (1248 pairs X \$4.50ea)	\$ 5,616	k-11-1-11-11-11-11-11-11-11-11-11-11-11-
-Respirator cartridges (1248 pairs X \$5.8	30a) <u>1 7,276</u>	INITIALBIBID.
	\$ 19,132	
Relabel Cost	•	DATE
-Obliterate old labels		<u> </u>
-Update and apply new labels	\$ 5,000	ATG SYMOOL
-First time relabel of 100 containers	\$ 5,000	
TOTAL TOTAL	2.000	INITIAL SISIO.
	\$ 12,000	
	• • •	BATE
		ATÉ SYMOGL
		OPPLANTA NA
	, x ,(.,	
1 - 1 - 1 - 2 - 1 - 1 - 1 - 1 - 1 - 1 -		angriffitting 🕸

TASK TOTAL \$ 5.000 \$202,197 CONCURRENTI PART TWO The following 1993 and 1994 deadlines represent 100 of the 500 containers which were not filled prior to 1 October, 1991 and organizations which were not filled prior to 1 October, 1991 and organizations on 100 containers required by October 1, 1991 New Labels Relabel cost \$ 174 Relabel cost \$ 2,000 S 2,424 Nay packaging on 100 containers required by October 1, 1991 New containers New containers New containers New containers New labels Relabel cost \$ 11,487 S 26,000 S 2,424 New packaging on 100 containers required by October 1, 1994 Relabel cost \$ 11,487 S 26,000 S 2,424 New containers New labels Relabel cost \$ 174 Relabel cost \$ 175 Relabel cost \$ 174 Relabel cost \$ 175 Relabel cost \$ 174 Relabel cost \$ 175 Relabel cost \$ 175 Relabel cost \$ 175 Relabel cost \$ 175 Relabel cost \$ 11,487 Relabel cost \$ 175 Relabel cost \$ 11,534 Relabel cost \$ 11,534 Relabel cost \$ 11,600 Relabel cost \$ 11,600 Relabel cost \$ 16,600 Relabel cost \$	Old Container Disposal -Decontamination labor (2p X 250hr X \$20 -Transportation to decon to Building 434 -Container compaction (2p X 125hr X \$20h -Transport to MSA TOTAL	hr) \$ 10,000 \$ 2,000 r) \$ 5,000 \$ 3,000 \$ 20,000	
The following 1993 and 1994 deadlines represent 100 of the 5000000000000000000000000000000000000	Misc. cost TASK TOTAL	\$ 5,000 \$202,197	CONCURRENCES
Communications on 100 containers required by October 1. 1993 New Labels Relabel cost S 174 Nisc. cost S 2,000 Nisc. cost TOTAL S 250 New packaging on 100 containers required by October 1. 1994 New containers Material transfer cost Personal protective equipment S 20,400 New labels Relabel cost S 174 New labels Relabel cost S 174 Relabel cost S 174 Relabel cost S 174 Relabel cost S 2,000 Misc. cost S 3,826 S 8/ /92 Act Transfer cost S 2,000 Misc. cost S 2,000 Misc. cost S 3,826 S 8/ /92 Act Transfer cost S 2,000 Misc. cost S 3,826 S 8/ /92 Act Transfer cost S 174 Act Transfer Containers Misc. cost S 1,74 Act Transfer Containers Misc. cost S 1,74 Act Transfer Containers Misc. cost S 1,74 Act Transfer Cost S 1,534 Misc. cost S 1,600 Act Transfer Cost S 1,000 Act Transfer Cost Act Transfer Cost S 1,000 Act Transfer Cost Act Transfer C			ATG SYMBOL
Relabel cost Misc. cost TOTAL S 2,000 S 2,424 Nay packaging on 100 containers required by October 1, 1994 New containers Material transfer cost Personal protective equipment New labels Relabel cost S 1,1487 SMCCracken Out New labels S 2,000 Old container disposal cost S 1,74 S 750 Misc. cost TOTAL The following 2001 deadline represents the remaining 400 Containers Material transfer cost S 1,74 S 7,50 Misc. cost S 1,74 Misc. cost S 2,000 Misc. cost S 1,74 Misc. cost Misc. cost S 1,74 Misc. cost Misc. cost S 1,74 Misc. cost Misc. cost Misc. cost Misc. cost S 1,74 Misc. cost Misc.	onempt per 49 CFR 171.14.		andower _
Relabel cost Misc. cost TOTAL S 2,000 S 2,424 Nay packaging on 100 containers required by October 1, 1994 New containers Material transfer cost Personal protective equipment New labels Relabel cost S 1,1487 SMCCracken Out New labels S 2,000 Old container disposal cost S 1,74 S 750 Misc. cost TOTAL The following 2001 deadline represents the remaining 400 Containers Material transfer cost S 1,74 S 7,50 Misc. cost S 1,74 Misc. cost S 2,000 Misc. cost S 1,74 Misc. cost Misc. cost S 1,74 Misc. cost Misc. cost S 1,74 Misc. cost Misc. cost Misc. cost Misc. cost S 1,74 Misc. cost Misc.	Communications on 100 containers required	by October 1.	8/5 /92 ATG SYMBOL 1993 / FUL 0/
Misc. cost TOTAL New packaging on 100 containers required by October 1. 1994 New containers Material transfer cost Personal protective equipment New labels Relabel cost TOTAL TOTAL The following 2001 deadline represents the remaining 400 New containers Material transfer cost Personal protective equipment S 1,780 S 750 S 750 S 42,837 The following 2001 deadline represents the remaining 400 Mew containers Mew containers Material transfer cost Personal protective equipment S 16,306 Mew containers Material transfer cost Personal protective equipment S 16,306 Relabel cost S 696 Membased Mew labels Relabel cost S 17,936 Membased Mew labels Relabel cost S 16,800 S 17,936 Membased Mew labels Relabel cost S 16,800			INITIAL SISTER
TOTAL S 250 S 2,424 S 2,424 S 2,424 New packaging on 100 containers required by October 1, 1994 New containers S 11,487 Material transfer cost Personal protective equipment S 20,400 Out 92 New labels S 174 New labels S 2,000 Old container disposal cost S 4,200 Misc. cost TOTAL S 750 The following 2001 deadline represents the remaining 400 Mew containers Material transfer cost Personal protective equipment S 15,306 Material transfer cost Material transfer cost Mew containers Material transfer cost Mew labels Material transfer cost Mew containers Material transfer cost Mesonal protective equipment S 15,306 Mesonal protective equipment S 20,000 Mesonal protective equipment S 31,534 Mesonal protective S 31,534 Mesonal protect	Relabel cost	\$ 174	, , , , , , , , , , , , , , , , , , ,
New packaging on 100 containers required by October 1, 1994 New containers Material transfer cost Personal protective equipment New labels New labels New labels New labels New container disposal cost New labels New container disposal cost New labels New container disposal cost New containers		\$ 2,000	N 8 action age ét
New containers New containers New containers New containers Material transfer cost Personal protective equipment New labels New labels S 174 New labels S 20,400 OATE New labels S 174 New labels S 2,000 Old container disposal cost S 4,200 MISC. cost TOTAL S 750 S 42,837 The following 2001 deadline represents the remaining 400 New containers New cont	TOTAL		DATE
New containers New containers Material transfer cost Personal protective equipment New labels Relabel cost Old container disposal cost TOTAL The following 2001 deadline represents the remaining 400 New containers New containers New containers S 11,487 S 20,400 Out S 174 Relabel cost S 174 Ard tyving		\$ 2.424	8/7/92
Material transfer cost Personal protective equipment S 3,826 New labels Relabel cost Old container disposal cost S 4,200 Misc. cost TOTAL S 750 S 42,837 The following 2001 deadline represents the remaining 400 Mew containers Material transfer cost Personal protective equipment S 13,534 Personal protective equipment S 15,306 Mew containers Material transfer cost Personal protective equipment S 15,306 Mew labels Relabel cost S 2,000 MITALLERG. MITA	New packaging on 100	, -, -,	ATG STURCE
Material transfer cost Personal protective equipment S 3,826 New labels Relabel cost Old container disposal cost S 4,200 Misc. cost TOTAL S 750 S 42,837 The following 2001 deadline represents the remaining 400 Mew containers Material transfer cost Personal protective equipment S 13,534 Personal protective equipment S 15,306 Mew containers Material transfer cost Personal protective equipment S 15,306 Mew labels Relabel cost S 2,000 MITALLERG. MITA	on two containers required	OV October 1 1	004 EW-94
Material transfer cost Personal protective equipment New labels Relabel cost Old container disposal cost TOTAL Symbol Mew containers Material transfer cost Full compliance by October 1, 2001 Mew containers Material transfer cost Mesterial transfer cost Pull compliance by October 1, 2001 Mew containers Material transfer cost Mesterial transfer cost Personal protective equipment Mew labels Relabel cost Signor	New containers	1 10000	994 INITIAL PRINC
New labels \$ 20,400 B/ /92 Relabel cost \$ 3,826 B/ /92 Relabel cost \$ 174 ATC SYMBOL Old container disposal cost \$ 4,200 BMTALERI. TOTAL \$ 750 ATE The following 2001 deadline represents the remaining 400 ATE Containers. Full compliance by October 1, 2001 New containers Material transfer cost \$ 31,534 BMTALERIC. Personal protective equipment \$ 81,600 ATC SYMBOL MEN labels Relabel cost \$ 31,534 BMTALERIC. ATC SYMBOL	Material tone	6 11 400	
Relabel cost Old container disposal cost S 2,000 Misc. cost TOTAL S 750 S 42,837 The following 2001 deadline represents the remaining 400 Mew containers New containers Material transfer cost Personal protective equipment Mew labels Relabel cost S 696 S 750 ATC SYMBOL MITALBERG.	Personal much	9 11,487	
Relabel cost Old container disposal cost S 2,000 Misc. cost TOTAL S 750 S 42,837 The following 2001 deadline represents the remaining 400 Mew containers New containers Material transfer cost Personal protective equipment Mew labels Relabel cost S 696 S 750 ATC SYMBOL MITALBERG.	No. 1 Protective equipment	\$ 20,400	1 · · · ·
Old container disposal cost Misc. cost TOTAL S 4,200 S 750 \$ 42,837 The following 2001 deadline represents the remaining 400 ATT STYMEN. Pull compliance by October 1, 2001 New containers Material transfer cost Personal protective equipment Mew labels Relabel cost Old container disposal cost S 696 MITALISED. ATT STYMEN. MITALISED. OATE ATT STYMEN. MITALISED. OATE ATT STYMEN. MITALISED. OATE ATT STYMEN. MITALISED. ATT STYMEN. MITALISED. ATT STYMEN. MITALISED. MITALISED. ATT STYMEN. MITALISED. MITALIS			
TOTAL The following 2001 deadline represents the remaining 400 The following 2001 deadline represents the remaining 400 Full compliance by October 1, 2001 New containers Material transfer cost Personal protective equipment Mew labels Relabel cost Total Total The following 2001 deadline represents the remaining 400 MITALSESS. ATT SYMBOL MITALSESS. MI	Relabel cost	\$ 174	ALC SAMMOF
TOTAL The following 2001 deadline represents the remaining 400 The following 2001 deadline represents the remaining 400 Full compliance by October 1, 2001 New containers Material transfer cost Personal protective equipment Mew labels Relabel cost Total Total The following 2001 deadline represents the remaining 400 MITALSESS. ATT SYMBOL MITALSESS. MI	Old container disposal cost	\$ 2,000	1
The following 2001 deadline represents the remaining 400 The following 2001 deadline represents the remaining 400 Full compliance by October 1, 2001 New containers Material transfer cost Personal protective equipment Mew labels Relabel cost Old container disposal cost Sisc. cost FOTAL FOTAL FOTAL STATE ATG SYMBOL MITALBEG. MITA	*******		INITIALS BIO.
The following 2001 deadline represents the remaining 400 ATT SYMBOL	TOTAL	, , , ,	
The following 2001 deadline represents the remaining 400 ATTO SYMBOL MULL COMPLIANCE by October 1, 2001 New containers Material transfer cost Personal protective equipment Mew labels Mew labels Material transfer cost Personal protective equipment Mew labels Med labels Me		\$ 42 927	DATE
Mew containers Material transfer cost Personal protective equipment Mew labels Relabel cost State of the stat	The following sees	4 44,63/	
Mew containers Material transfer cost Personal protective equipment Mew labels Relabel cost State of the stat	Container 2001 deadline represents the	mama da d	
Mew containers Material transfer cost Personal protective equipment Mew labels Relabel cost State of the stat	containers.	remaining 400	ALG SAMSOF
Mew containers Material transfer cost Personal protective equipment New labels Relabel cost State of the stat			
Mew containers Material transfer cost Personal protective equipment New labels Relabel cost State of the stat	full compliance by October 1 2001		
Material transfer cost Personal protective equipment New labels Relabel cost Old container disposal cost Sisc. cost NOTAL MINALEGE ATG SYMBOL MINALEGE MINA			IMITIAL BIBIG.
Material transfer cost Personal protective equipment New labels Relabel cost Old container disposal cost Sisc. cost NOTAL MINALEGE ATG SYMBOL MINALEGE MINA	New containers		DATE
New labels Relabel cost Old container disposal cost NOTAL ###################################	Material transfer and	\$ 31.514	
Relabel cost Old container disposal cost Sisc. cost POTAL ATC SYMEGA WHITMLESSE WHITMLESSE ATC SYMEGA WHITMLESSE WHITMLE	Personal protective and	\$ 81 600	ATG SYMEOL
Relabel cost Old container disposal cost Sisc. cost NOTAL N	New labels	\$ 18 200	1
Sign cost # 16,800 # 16,800 # 157,936 Are symbol Are symbol Are symbol Are symbol Are symbol Are symbol	Relabel cont		***********
POTAL STATE PAGE # 16,800 # 157,936 ATG SYMBOL MAINING. PAGE SYMBOL METALOGICAL MAINING. PAGE SYMBOL METALOGICAL METALOGIC	Old contains at		MITMLEIBIG.
POTAL STATE PAGE # 16,800 # 157,936 ATG SYMBOL MAINING. PAGE SYMBOL METALOGICAL MAINING. PAGE SYMBOL METALOGICAL METALOGIC	Miss container disposal cost	₹ ₹,000	
#157,936 ATE SYMBOL WITHLISH ATE SYMBOL OUTPLANDS.			CATE
#-94:JEnright:x7006:emh:8/5/92 (m:DOTRqHTS)	TOTAL	4.000	
#-94:JEnright:x7006:emh:8/5/92 (m:DOTRqHTS)		\$157,936	and the same
#=94:JEnright:x7006:emh:8/5/92 (m:DOTRqHTS)		,	ALC SAMPLE
#=94:JEnright:x7006:emh:8/5/92 (m:DOTRqHTS)			2000 100000
Ard Symbol			PHTALE BASIS
Ard Symbol	Riman and a second a second and		1
Ard Symbol	m-yelushrightix7006(enhi8/5/92 (mihhteaure)		DAPE
PRTMLB-818.	/minotiduta)		1
PRTMLB-818.			AND STANCE
PETALBOIG.			HIS STATES
PETALBOIG.			
			PETALSOIS
			1
18473			